

REMARKS

In an Office Action mailed on March 17, 2003, claims 1-9 and 18 were rejected under 35 U.S.C. § 102(e) as being anticipated by Tarlton; claims 1-22 were rejected under 35 U.S.C. § 102(e) as being anticipated by Kilgore; claims 1-12, 18 and 20 were rejected under 35 U.S.C. § 102(e) as being anticipated by Moss; and claims 23 and 24 were objected to as being dependent upon a rejected base claim but allowable if rewritten in independent form.

Rejections of Claims 1-8:

As amended, the system of claim 1 includes a well and a carousel of tools that is sealed within the well to automatically and selectively deploy the tools in the well. At least one of these tools is adapted to deploy sensors at a predetermined depth.

Claim 1 is rejected under § 102 in view of Tarlton. Contrary to the limitations of claim 1, Tarlton neither teaches nor suggests a carousel of tools that is sealed within a well. In this manner, Tarlton discusses a subsea pipeline. However, Tarlton neither teaches nor suggests that its disclosed carousel is sealed in a well. A pipeline is not a well. Therefore, Tarlton fails to teach all of the limitations of claim, and thus, withdrawal of the § 102 rejections of claims 1-8 in view of Tarlton is requested.

Claim 1 is also rejected under § 102 in view of Kilgore. Kilgore discloses a tool selector 320 that "holds a corresponding plurality of well completion and maintenance tools." Kilgore, 5:33-35. However, Applicant can find no teaching in Kilgore relating to a tool (of the tool selector) that is adapted to deploy sensors at a predetermined depth. Therefore, Kilgore fails to teach all of the limitations of claim 1, and thus, withdrawal of the § 102 rejections of claim 1-8 in view of Kilgore is requested.

Claim 1 is also rejected under § 102 in view of Moss. Although Moss teaches "logging sondes for well surveillance (see lines 50-59 of column 4, for example), Moss neither teaches nor suggests a tool (of a carousel of tools) that is adapted to deploy sensors at a predetermined depth. Therefore, Moss fails to teach all limitations of claim 1, and thus, withdrawal of the § 102 rejections of claims 1-8 is requested.

Rejections of Claims 10-12:

Claim 10 is rejected under § 102 in view of either Kilgore or Moss. However, neither of these references teaches or even suggests halting the flow of fluid in a well and deploying a tool within the well while the fluid is halted. Furthermore, although Kilgore mentions using well pressure to retrieve a tool, neither Kilgore nor Moss teaches or suggests resuming a flow of fluid in a well to retrieve a tool. Therefore, neither Moss nor Kilgore teaches all limitations of independent claim 10, and thus, withdrawal of the § 102 rejections of claims 10-12 is requested.

Rejections of Claims 13-17:

The method of claim 13 includes injecting sensors into a fluid of a well and using the sensors to measure at least one environmental property of the well. The method includes retrieving data from the sensors indicating the measurements.

Claim 13 is rejected under § 102 in view of Kilgore. However, Kilgore discusses completion and maintenance tools 327 and does not teach or even suggest sensors to measure an environmental property of the well. *See, for example*, Kilgore, 5:33-35. Thus, for at least this reason, Kilgore fails to teach the limitations of independent claim 13 and withdrawal of the § 102 rejections of claims 13-17 in view of Kilgore is requested.

Rejections of Claims 18-24:

The system of claim 18 includes a well and a robot that is sealed in the well to selectively perform an intervention.

Claim 18 is rejected under § 102 in view of Tarlton. However, Tarlton discusses subsea pipelines, not wells and thus, neither teaches nor suggests any structure inside a well, much less a robot. Thus, for at least this reason, Tarlton fails to disclose the limitations of claim 18. Therefore, withdrawal of the § 102 rejections of claims 18-24 in view of Tarlton is requested.

Claim 18 is also rejected under § 102 in view of Kilgore. Kilgore discusses a tool displacement mechanism 310 to slow the tool string during freefall and initiate traction along the production tubing. *See, for example*, Kilgore, 6:64-67. However, Kilgore does not teach that the tool displacement mechanism 310 is a robot. Furthermore, there is no other teaching or

suggestion of such a robot in Kilgore. Thus, withdrawal of the § 102 rejections of claims 18-22 in view of Kilgore is requested.

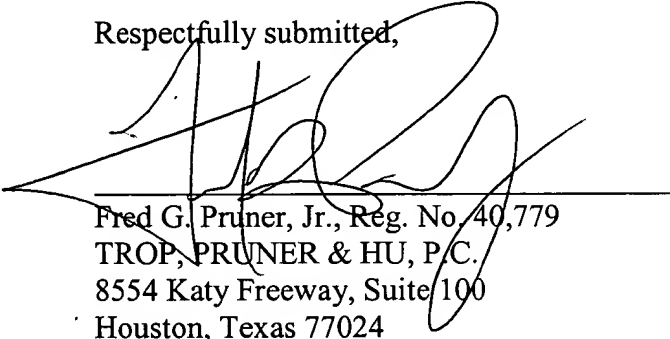
Claim 18 is also rejected under § 102 in view of Moss. However, Applicants can find no teaching in Moss of a robot that is sealed in a well to selectively perform an intervention. Therefore, for at least this reason, withdrawal of the § 102 rejections of claims 18 and 20 in view of Moss is requested.

CONCLUSION

In view of the foregoing, withdrawal of the § 102 rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (22.1410).

Respectfully submitted,

Date: June 17, 2003



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